

Exhibit 27

In The Matter Of:

IN RE SEPTEMBER 11 LITIGATION

ROBERT J. CAMMAROTO

February 11, 2008

***HIGHLY CONFIDENTIAL/
CONFIDENTIAL SSI MATERIAL
TC REPORTING in affiliation with Merrill
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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
09:14:50 2 daylight time on September 11, 2001. I will try
09:14:55 3 to make the time period clear in my questions,
09:14:57 4 but I may fail. But unless I say otherwise you
09:15:00 5 should interpret my questions as referring only
09:15:03 6 to security procedures in effect on or before
09:15:07 7 9/11, 2001. On the rare occasion if any I ask
09:15:13 8 any post 9/11 questions. I will make the time
09:15:15 9 explicit.

09:15:18 10 I would like to turn first to topic
09:15:21 11 2 which relates to CAPPS and is described on
09:15:25 12 page 4 and 5 of the February 7, 2008 final
09:15:29 13 determination. First of all, to avoid any
09:15:36 14 mystery what does the acronym CAPPS stands for?

09:15:39 15 A. The if acronym for CAPPS went
09:15:41 16 through several iterations, but the one was in
09:15:47 17 place on September 11 Computer Assisted
09:15:50 18 Passenger Prescreening System.

09:15:50 19 Q. Would you briefly describe for us
09:15:51 20 the purpose of the CAPPS program as it existed
09:15:54 21 on September 11, 2001?

09:15:54 22 A. The primary purpose of the CAPPS
09:15:56 23 program was to provide a tool to the air
09:16:01 24 carriers by which they could focus their limited
09:16:04 25 resources on checked baggage, typically for

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09:16:08 2 explosives in checked baggage.

09:16:10 3 Q. What was the nature of the security
09:16:12 4 threat that the CAPPS program was designed to
09:16:14 5 address?

09:16:14 6 A. It was primarily designed to
09:16:17 7 address explosives secreted in checked
09:16:22 8 baggage.

09:16:23 9 Q. Would it be fair to describe the
09:16:24 10 threat CAPPS was designed primarily to address
09:16:27 11 as being the threat of bombings of aircraft by
09:16:31 12 non-suicidal terrorists?

09:16:34 13 MS. VARGAS: Objection to the
09:16:35 14 form.

09:16:36 15 MS. HESSION: Objection to the
09:16:36 16 form.

09:16:37 17 A. Yes, sir.

09:16:39 18 MR. PODESTA: I would like to now
09:16:40 19 have marked as the non-SSI Exhibit 756, a
09:16:45 20 document which purports to be -- it is from
09:16:51 21 the -- it bears document production numbers TSA
09:16:55 22 10358 through TSA 10409 and it purports to be a
09:17:05 23 Notice of Proposed Rule Making By the Federal
09:17:11 24 Aviation Administration Entitled Security of
09:17:14 25 Checked Baggage on Flights Within the United

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10:39:00 2 effective countermeasures to what it perceived
10:39:03 3 the terrorist threat to be?
10:39:06 4 MS. HESSION: Objection.
10:39:07 5 MS. VARGAS: Objection to the
10:39:07 6 form.
10:39:07 7 A. Yes, sir. I would add that what we
10:39:10 8 perceived to be one of the major threats.
10:39:13 9 Q. What were those major threats to
10:39:15 10 which you just referred?
10:39:16 11 A. That is we discussed earlier
10:39:18 12 regarding explosives in checked baggage.
10:39:27 13 Q. Now, I just like to turn back for a
10:39:31 14 moment to 7D of the ACSSP exhibit. As of 9/11,
10:39:44 15 under the ACSSP requirements then in effect,
10:39:50 16 were air carriers permitted to ask the baggage
10:39:58 17 control questions, the security questions in
10:40:01 18 written form if the passenger appeared to have
10:40:04 19 difficulty understanding them in oral form?
10:40:08 20 A. Yes, sir, the security program
10:40:10 21 permitted that.
10:40:13 22 Q. Is that permission set forth in
10:40:16 23 section D5 of the ACSSP on page 79?
10:40:27 24 A. Yes, sir.
10:40:28 25 Q. Where the passenger spoke a foreign

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14:21:59 2 referring to the last clause of the knives
14:22:01 3 section?

14:22:01 4 A. Yes, sir, I see that. Yes, and we
14:22:03 5 were very much in tune with the local law at
14:22:06 6 that local site.

14:22:08 7 Q. When you mean to say -- is the
14:22:09 8 reference to local law a reference to the local
14:22:12 9 law of the jurisdiction in which the screening
14:22:15 10 activity takes place?

14:22:16 11 A. That's correct. Where the airport
14:22:19 12 would be responsible for the law enforcement
14:22:21 13 support, the law enforcement support they would
14:22:24 14 send that is how we were gauging it.

14:22:27 15 Q. As of 9/11 under the ACSSP and the
14:22:31 16 FAA's deadly or dangerous weapon guidelines, did
14:22:35 17 the FAA prohibit knives with blades less than
14:22:41 18 four inches long and that were legal under local
14:22:44 19 law from entering the sterile area?

14:22:47 20 A. We did not.

14:22:49 21 MR. PEPE: Objection to the form.

14:22:51 22 Q. As of 9/11 under the ACSSP and the
14:22:54 23 FAA's deadly or dangerous weapons guidelines,
14:22:58 24 were most knives with blades less than four
14:23:01 25 inches long permitted into the sterile area?

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
14:23:04 2 MR. PEPE: Objection.
14:23:05 3 MS. HESSION: Objection.
14:23:05 4 MS. VARGAS: Objection.
14:23:06 5 A. It is hard to answer to the most
14:23:07 6 but certainly again a knife under four inches
14:23:10 7 would have been permitted outside of the fact
14:23:12 8 that the local jurisdiction may have precluded
14:23:15 9 them as was the case at Pittsburgh and Baltimore
14:23:18 10 in my own experience.
14:23:19 11 Q. I will ask you some more about
14:23:21 12 local laws in a minute. I would like to direct
14:23:23 13 your attention now to your Moussaoui testimony
14:23:31 14 at page 1845, lines 8 through 22. I will accept
14:23:35 15 the description of this testimony,
14:23:39 16 qualifications on it that Ms. Vargas has
14:23:42 17 previously stated.
14:23:43 18 MS. VARGAS: What page number
14:23:44 19 again?
14:23:44 20 MR. PODESTA: 1845 lines 8 to 22.
14:23:56 21 Q. Mr. Novack asked you at that point,
14:24:00 22 he is discussing this in the context of
14:24:02 23 Moussaoui revealing the details of the Al Qaeda
14:24:05 24 plot. "Let's talk about what if any
14:24:08 25 countermeasures you could have used before

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14:24:10 2 somebody got on the plane. Specifically, let's
14:24:12 3 talk about the use of the short bladed knives.
14:24:15 4 What is it that you could have done in relation
14:24:17 5 to prohibiting the four inch blades?
14:24:20 6 "Answer: We could have modified the
14:24:23 7 requirement that the air carriers had at that
14:24:27 8 time in the SSP. There was an Appendix I that
14:24:31 9 said what items were prohibited from going on
14:24:34 10 board the aircraft, some general categories,
14:24:36 11 some very specific, but it did have the
14:24:40 12 exception that blades less than four inches were
14:24:44 13 permitted basically. And we could have said in
14:24:47 14 a Security Directive, and that would have been
14:24:49 15 the appropriate vehicle, don't allow any blades
14:24:52 16 whatsoever. And that would have of course, had
14:24:55 17 to be applied at the checkpoint."
14:24:58 18 Did you give that answer at the
14:25:01 19 Moussaoui trial.
14:25:01 20 A. Yes, sir, I did.
14:25:02 21 Q. And was it truthful and accurate to
14:25:04 22 the best of your ability?
14:25:05 23 A. Yes, sir.
14:25:06 24 Q. I would like to direct your
14:25:20 25 attention to page 1877 of your testimony at the

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
14:26:34 2 A. Yes, sir.
14:26:36 3 Q. And were they truthful and accurate
14:26:37 4 to the best of your ability?
14:26:39 5 A. Yes, sir.
14:26:43 6 MR. PEPE: Objection.
14:26:44 7 Q. I am just trying to see if you
14:26:50 8 could help me with understanding the meaning of
14:26:55 9 the knives paragraph in Appendix I. As of 9/11,
14:27:00 10 under the ACSSP and FAA's deadly or dangerous
14:27:08 11 weapons guidelines as set forth in Appendix I
14:27:11 12 were knives with played length of less than four
14:27:14 13 inches allowed into the sterile area unless they
14:27:17 14 came within one of the two following exceptions:
14:27:21 15 First, they were a type of knife that illegal
14:27:26 16 under local law, or two, the screener exercised
14:27:30 17 his or her common sense to conclude that a
14:27:34 18 particular knife under four inches should be
14:27:37 19 treated as a deadly or dangerous weapon?
14:27:39 20 MR. PEPE: Objection.
14:27:40 21 MS. HESSION: Objection, objection
14:27:41 22 to the form.
14:27:41 23 A. In those two circumstances they
14:27:43 24 would be permitted.
14:27:46 25 Q. But apart from those two exceptions

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
14:27:48 2 did FAA regulations as in effect on 9/11 permit
14:27:51 3 knives with a blade length of less than four
14:27:54 4 inches to enter the sterile area?

14:27:58 5 MR. ELSNER: Objection.

14:28:00 6 MR. PEPE: Objection.

14:28:00 7 A. Of less than four inches, yes.

14:28:02 8 Q. Under the FAA regulations in effect
14:28:04 9 on 9/11, did the FAA maintain any list or
14:28:06 10 compilation of local laws pertaining to the
14:28:10 11 carriage of knives by members of the general
14:28:12 12 public?

14:28:14 13 A. Not that I'm aware of, sir.

14:28:17 14 Q. Are you aware of any Massachusetts,
14:28:20 15 state or local law in force on 9/11 that
14:28:24 16 prohibited members of the general public from
14:28:27 17 possessing or carrying Swiss Army knives?

14:28:32 18 MR. WARDEN: Objection.

14:28:32 19 A. I was not aware of that law.

14:28:35 20 Q. Leatherman multitools?

14:28:37 21 MR. PEPE: Objection.

14:28:37 22 A. I was not aware of that, sir.

14:28:39 23 Q. Pocket utility knives?

14:28:42 24 MR. ELSNER: Objection.

14:28:44 25 Q. You have to answer audibly. You

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL

14:29:29 2 Q. My last local law, New Jersey. Are

14:29:31 3 you aware of any New Jersey state or local law

14:29:36 4 in force on 9/11 that prohibited members of the

14:29:39 5 general public from possessing or carrying Swiss

14:29:43 6 Army knives?

14:29:44 7 A. I am not aware of one.

14:29:45 8 Q. Leatherman multitools?

14:29:47 9 A. Not aware of it, sir.

14:29:48 10 Q. Pocket utility knives?

14:29:49 11 A. Have no awareness.

14:29:51 12 Q. Box cutters?

14:29:52 13 A. Was not aware, sir.

14:29:55 14 Q. Under the ACSSP and the FAA deadly

14:30:00 15 or dangerous weapons guidelines as in effect on

14:30:03 16 9/11, if a screener discovered a knife with a

14:30:08 17 blade length under four inches during a

14:30:10 18 screening process, and there was no indication

14:30:13 19 that it was unlawful for members of the general

14:30:15 20 public to carry that type of knife under local

14:30:18 21 law, was the screener free to return that knife

14:30:22 22 to the passenger unless he found that particular

14:30:25 23 knife threatening?

14:30:26 24 MR. PEPE: Objection.

14:30:27 25 MS. VARGAS: Objection.

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
14:30:28 2 A. Yes, sir.
14:30:29 3 Q. By free to return, I mean free to
14:30:31 4 return it to the passenger and the passenger
14:30:34 5 could take it into the sterile area?
14:30:35 6 A. The caveat it was under four
14:30:37 7 inches?
14:30:38 8 Q. Yes.
14:30:38 9 A. Yes.
14:30:46 10 MR. PODESTA: I would like to have
14:30:48 11 marked as the next exhibit TSA 11526. This is
14:30:51 12 an SSI exhibit. I think this is part of a three
14:31:00 13 page exhibit, so what I am introducing is TSA
14:31:04 14 11526 through TSA 11528 the reporter tells me
14:31:17 15 this is SSI Exhibit 18.
14:31:17 16 (Deposition Exhibit SSI 18
14:31:17 17 for identification, Knives and Sharp Objects, no
14:31:42 18 production.)
14:31:42 19 Q. It is a document dated September
14:31:44 20 16, 2001 and bears the caption Knives And Sharp
14:31:49 21 Objects. It has apparently a distinguished
14:31:53 22 author, a Bob Cammaroto.
14:31:56 23 MS. VARGAS: Objection,
14:31:57 24 foundation.
14:32:00 25 A. I second the objection.

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
15:01:34 2 MR. PODESTA: As to the
15:01:35 3 consideration. Yes.
15:01:36 4 MR. PEPE: Objection to the form.
15:01:37 5 A. The FAA took that into
15:01:39 6 consideration and made that one of the factors
15:01:41 7 in its decision not to modify the maximum
15:01:44 8 length.
15:01:45 9 Q. Before 9/11 was the FAA aware that
15:01:49 10 it was possible for terrorists to improvise
15:01:53 11 small cutting implements once they were inside
15:01:55 12 the sterile area?
15:01:58 13 A. Yes, sir.
15:02:00 14 Q. For example, prior to 9/11 were
15:02:01 15 wine bottles permitted inside the sterile area?
15:02:06 16 A. Yes, sir.
15:02:09 17 Q. Prior to 9/11 under the FAA
15:02:11 18 regulations in force, could items in glass
15:02:14 19 bottles be purchased inside the sterile area at
15:02:17 20 many domestic airports?
15:02:19 21 A. Yes, sir.
15:02:20 22 Q. Isn't it relatively easy for a
15:02:28 23 trained terrorist to convert a wine bottle into
15:02:30 24 a weapon?
15:02:31 25 MR. MIGLIORI: Objection.

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15:02:32 2 MR. PEPE: Objection.
15:02:33 3 MS. VARGAS: Objection.
15:02:34 4 MR. PODESTA: He testified on the
15:02:35 5 subject.
15:02:37 6 A. A wine bottle could be used as a
15:02:39 7 weapon. It could be made to be used as a
15:02:41 8 weapon.
15:02:41 9 Q. I would like to direct you Mr.
15:02:45 10 Moussaoui -- Mr. Cammaroto, pardon the insult.
15:02:50 11 Although maybe that is a good idea, maybe I will
15:02:52 12 depose him, too.
15:02:54 13 A. That is not a Freudian slip there.
15:02:57 14 Q. I direct you testimony to pages
15:03:01 15 1879 and 1880 of your Moussaoui trial testimony
15:03:11 16 starting at the question page 1879 line 23 and
15:03:23 17 continuing to 1880. The question you
15:03:40 18 answered -- I believe this is cross-examination
15:03:41 19 by defense counsel. "In fact all you can take
15:03:45 20 glass -- you can take glass bottles on to an
15:03:48 21 airplane; couldn't you?
15:03:49 22 "Answer: Especially if they were
15:03:51 23 empty, yes, sir.
15:03:52 24 "Question: Especially what?
15:03:53 25 "Answer: Especially if they were

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
15:03:55 2 empty, sure.
15:03:56 3 "Question: Well, you could take
15:03:57 4 them on if they were full, if they were unopened
15:04:00 5 you could take glass bottles on?
15:04:02 6 "Answer: If they were sealed yes,
15:04:04 7 sir.
15:04:04 8 "Question: In fact you could take
15:04:06 9 an unopened bottle of wine onto an airplane;
15:04:09 10 couldn't you?
15:04:13 11 "Answer: Yes, you could.
15:04:14 12 "Question: And in fact the
15:04:15 13 Vineyards would sell carrying cases you can take
15:04:19 14 right on to the airplane, right? You can put
15:04:22 15 three bottles on and take them in."
15:04:24 16 Your answer was "Unfortunately I
15:04:26 17 never had the pleasure of visiting the wine
15:04:28 18 country.
15:04:29 19 "Question: You never had the
15:04:30 20 pleasure, but you seem to know I can walk up
15:04:33 21 with my little case of three from the Sonoma
15:04:35 22 Valley and walk onto an airplane in those days
15:04:38 23 in San Francisco and put it on that conveyor
15:04:41 24 belt we saw and have it just go on through and
15:04:44 25 nobody -- is that right?

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
15:04:45 2 "Answer: I was going to say that is
15:04:47 3 probably fair.
15:04:48 4 "Question: And nobody would object
15:04:49 5 to it?
15:04:50 6 "Answer: I would think you're
15:04:51 7 right. I think somebody would have probably done
15:04:53 8 what we called the bottle check in those days to
15:04:55 9 make sure it didn't contain gasoline or
15:04:58 10 something like that, so they weren't just
15:04:59 11 completely ignored."
15:05:01 12 It goes on "Right, but it was in
15:05:03 13 terms of being a potential weapon there was no
15:05:05 14 prohibition on it?"
15:05:07 15 Your answer was "Once it had been
15:05:09 16 determined not to be other than what it
15:05:11 17 purported to be, yes."
15:05:12 18 Did you give those answers in
15:05:14 19 response to those questions in your Moussaoui
15:05:16 20 testimony.
15:05:16 21 MR. TOMASIK: Objection.
15:05:17 22 MR. PEPE: Objection.
15:05:18 23 A. Yes, sir.
15:05:19 24 Q. Do you believe them to be truthful
15:05:21 25 and accurate to the best of your ability?

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
15:05:22 2 MR. PEPE: Objection.
15:05:23 3 A. Yes, sir.
15:05:26 4 Q. Can a wine bottle be turned into a
15:05:27 5 weapon in a matter of seconds, Mr. Cammaroto?
15:05:31 6 MR. TOMASIK: Objection.
15:05:31 7 MS. VARGAS: Objection.
15:05:32 8 A. A wine bottle can be used as a
15:05:35 9 weapon, yes, sir.
15:05:46 10 Q. On page 1881 of your testimony in
15:05:52 11 this wine bottle sequence question if you know
15:05:54 12 perfectly well I can turn that into a weapon in
15:05:57 13 a matter of seconds; right?" Your answer "I
15:06:00 14 imagine it could be, yes."
15:06:02 15 Did you give that answer at your
15:06:04 16 Moussaoui trial testimony?
15:06:05 17 MR. PEPE: Objection, hearsay.
15:06:06 18 A. Are you talking about lines --
15:06:09 19 Q. 17 through 19 on 1881.
15:06:15 20 A. Yes, sir, I see that. Yes.
15:06:17 21 Q. Was that truthful and accurate to
15:06:19 22 the best of your ability?
15:06:20 23 A. Yes, sir.
15:06:22 24 Q. Many bar fight has provided the
15:06:24 25 dangers of a broken bottle; hasn't it?

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
15:06:27 2 MS. VARGAS: Objection.
15:06:28 3 MR. TOMASIK: Objection.
15:06:29 4 MS. VARGAS: The FAA is not
15:06:30 5 testifying as to the dangers of bar fights.
15:06:35 6 Q. A sharp edge broken bottle could be
15:06:37 7 a dangerous weapon, could it not, if the
15:06:40 8 terrorist had the advantage of surprise in
15:06:42 9 confronting a flight attendant in the close
15:06:45 10 quarters of an airport cabin?
15:06:47 11 MR. PEPE: Objection.
15:06:48 12 MS. VARGAS: Objection.
15:06:48 13 A. Yes, sir.
15:07:00 14 Q. Going back to Exhibit 771, there is
15:07:01 15 a category rationales that may or may not have
15:07:04 16 formed a basis for FAA's decision to maintain
15:07:07 17 the four inch rule.
15:07:10 18 Did your investigation reveal any
15:07:12 19 rationales for the -- any possible reasons for
15:07:17 20 the four inch knife rule you could not either
15:07:20 21 definitively rule in or rule out as being a
15:07:23 22 reason for the rule?
15:07:26 23 MR. MIGLIORI: Objection.
15:07:27 24 MS. VARGAS: Objection to the
15:07:28 25 form.

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
15:12:44 2 average passenger?

15:12:45 3 A. There is no study on that that I'm
15:12:47 4 aware of, sir.

15:12:48 5 Q. Prior to 9/11 did the FAA conduct
15:12:51 6 any analysis of the effect of a prohibition of
15:12:53 7 short bladed knives on checkpoint congestion
15:12:57 8 and length of passenger lines at security
15:13:00 9 checkpoints?

15:13:00 10 A. Not that I'm aware of, sir.

15:13:03 11 Q. As of 9/11 had the FAA made a
15:13:06 12 deliberate decision to permit entry of most
15:13:09 13 short bladed knives into the sterile area and to
15:13:11 14 permit their carriage on board commercial
15:13:14 15 passenger aircraft?

15:13:16 16 MS. HESSION: Objection to the
15:13:17 17 form.

15:13:17 18 MS. VARGAS: Objection.

15:13:17 19 A. What we had determined and
15:13:19 20 memorialized through the language in the SSP is
15:13:22 21 that four inch test was the bellwether.

15:13:27 22 Q. Prior to 9/11 did the FAA consider
15:13:30 23 a prohibition on the entry of all short bladed
15:13:33 24 knives into the sterile area to be reasonably
15:13:37 25 necessary for the security of the traveling

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
15:13:39 2 public?

15:13:40 3 A. Sorry, I ask you repeat that.

15:13:42 4 Q. Yes. Prior to 9/11 did the FAA

15:13:44 5 consider a prohibition on the entry of all short

15:13:47 6 bladed knives into the sterile area to be

15:13:51 7 reasonably necessary for the security of the

15:13:53 8 traveling public?

15:13:55 9 A. It did not.

15:14:01 10 MR. PEPE: Move to strike.

15:14:02 11 Q. Prior to 9/11 did the FAA have the

15:14:04 12 authority to prohibit the entry of all short

15:14:08 13 bladed knives into the sterile area if it had

15:14:11 14 considered such a prohibition to be necessary,

15:14:14 15 reasonably necessary for protection of the

15:14:17 16 traveling public?

15:14:17 17 MR. PEPE: Objection.

15:14:18 18 MR. TOMASIK: Objection.

15:14:19 19 A. Yes, sir, we had that authority.

15:14:25 20 MR. PODESTA: I would like to have

15:14:26 21 now marked as Exhibit TSA 11524. This is a

15:14:55 22 restricted use document.

15:14:56 23 (Deposition Exhibit SSI 19

15:15:14 24 for identification, FAA Position on Box Cutters,

15:14:27 25 production numbers TSA 11524.)

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
17:47:42 2 form.

17:47:42 3 MS. VARGAS: Objection to the
17:47:43 4 form, foundation.

17:47:44 5 MR. CAMPBELL: Objection to the
17:47:44 6 form.

17:47:44 7 A. Sir, I am going to stick with the
17:47:46 8 not inconsistent.

17:47:48 9 Q. Okay. I tried.

17:48:20 10 I think Mr. Podesta asked you about
17:48:22 11 some of your testimony in the Moussaoui trial
17:48:26 12 where you indicated what the FAA could have done
17:48:31 13 if it had some specific intelligence in the way
17:48:35 14 of additional countermeasures. Do you remember
17:48:37 15 those questions?

17:48:38 16 A. I remember the general line of
17:48:40 17 questioning, yes, sir.

17:48:41 18 Q. Sorry, you remember what?

17:48:42 19 A. The general line of questioning, I
17:48:44 20 don't know --

17:48:45 21 Q. I don't want to repeat all of
17:48:47 22 those. But I want to make sure you have the
17:48:49 23 line of questions in context of my next question
17:48:50 24 okay.

17:48:51 25 A. Yes, sir. Thank you.

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17:48:55 2 Q. You were talking about

17:48:56 3 countermeasures the FAA itself could have

17:48:59 4 specifically required the airlines to follow by

17:49:03 5 issuing SDs, Security Directives; correct?

17:49:07 6 A. That's correct, yes, sir.

17:49:08 7 Q. Would it be a fair statement that

17:49:13 8 all of the examples of additional

17:49:15 9 countermeasures that the FAA could have required

17:49:17 10 before September 11, 2001 were feasible as far

17:49:20 11 as you were concerned?

17:49:21 12 MR. CAMPBELL: Objection to the

17:49:23 13 form.

17:49:23 14 MR. PODESTA: Objection to the

17:49:23 15 form.

17:49:23 16 MS. VARGAS: Objection to the

17:49:24 17 form.

17:49:27 18 A. Do you mean the contingency

17:49:29 19 measures in Appendix XV?

17:49:31 20 Q. No. I actually mean --

17:49:34 21 MS. VARGAS: Refer him to the

17:49:35 22 pages of the Moussaoui testimony for

17:49:37 23 clarification as to the countermeasures.

17:49:41 24 Q. Sure. In your testimony in

17:49:42 25 Moussaoui at page 1845 to 1846 you talk about

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
17:49:49 2 prohibiting blades shorter than four inches.

17:49:56 3 A. Yes, sir.

17:49:57 4 Q. On page 1853 you talk about

17:50:04 5 additional screening measures in the form of

17:50:07 6 pat-down and physical searches in following

17:50:10 7 walk-through metal detector. Do you see that?

17:50:17 8 A. Yes, sir.

17:50:17 9 Q. On page 1859 in your Moussaoui

17:50:19 10 testimony you talk about changing the

17:50:22 11 sensitivity of the walk-through metal detectors

17:50:24 12 for smaller metallic items; right?

17:50:27 13 A. I am looking there, sir. Yes, sir.

17:50:32 14 Q. All of those countermeasures were

17:50:36 15 feasible, put differently all of those

17:50:39 16 particular actions could have been done before

17:50:42 17 September 11, 2001, it is just that the FAA did

17:50:48 18 not have specific intelligence to direct them to

17:50:50 19 be done; am I right?

17:50:52 20 MS. VARGAS: Objection.

17:50:55 21 Speculative and it calls for opinion testimony.

17:50:58 22 MR. PODESTA: Also object it is

17:51:00 23 outside the topic. It is getting into the

17:51:02 24 threat assessment.

17:51:03 25 MS. VARGAS: I don't believe we

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
17:51:04 2 are getting into threat assessments. I disagree
17:51:07 3 with you, Mr. Podesta. But I am going to
17:51:12 4 instruct the witness not to answer. It's
17:51:16 5 speculative as to what the FAA could or could
17:51:17 6 not have done in a particular situation that was
17:51:22 7 not presented to it.

17:51:22 8 MR. PODESTA: I will accept that.

17:51:23 9 Q. I am not asking what the FAA could
17:51:25 10 have done. I apologize if I conveyed that. I
17:51:27 11 am asking Mr. Cammaroto if the airlines could
17:51:33 12 have carried out those countermeasures before
17:51:36 13 September 11, 2001, that is was it feasible for
17:51:40 14 the airlines to carry out the countermeasures
17:51:42 15 that you mentioned in your Moussaoui testimony?

17:51:44 16 MR. PODESTA: Objection,
17:51:45 17 speculation and outside the topic.

17:51:48 18 MR. ELLIS: Can you specify for
17:51:49 19 record what countermeasures we are referring to
17:51:51 20 just so we are clear on the record?

17:51:53 21 MS. VARGAS: Objection.

17:51:55 22 MR. WARDEN: I think I went
17:51:56 23 through them with Mr. Cammaroto in specific
17:51:59 24 pages in his testimony. I am talking about
17:52:01 25 those specific pages and those specific

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
17:52:03 2 countermeasures.

17:52:03 3 MR. ELLIS: Just so we are clear on
17:52:05 4 the record, can we identify what the
17:52:06 5 countermeasures were? There were a lot of
17:52:09 6 countermeasures that were listed.

17:52:12 7 Q. Let me ask Mr. Cammaroto if he can
17:52:13 8 answer my question. If he can't I will rephrase
17:52:15 9 it.

17:52:16 10 MS. VARGAS: Can we repeat the
17:52:17 11 question back because I need to hear it.

17:52:41 12 (The pending question was read as
17:52:41 13 follows:

17:51:24 14 "Question: I am not asking what
17:51:24 15 the FAA could have done. I apologize if I
17:51:27 16 conveyed that. I am asking Mr. Cammaroto if the
17:51:32 17 airlines could have carried out those
17:51:34 18 countermeasures before September 11, 2001, that
17:51:38 19 is was it feasible for the airlines to carry
17:51:41 20 out the countermeasures that you mentioned in
17:51:42 21 your Moussaoui testimony?")

17:52:42 22 MR. PODESTA: Objection to the
17:52:42 23 form, speculation and beyond the scope of the
17:52:44 24 witness' 30(b)(6) testimony.

17:52:47 25 MS. VARGAS: Can we take a

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL

17:54:53 2 Q. When you gave your testimony in the
17:54:55 3 Moussaoui trial, you were testifying in I
17:54:59 4 believe, the sentencing phase of a man that had
17:55:02 5 been convicted of murder; weren't you?

17:55:04 6 A. That's correct, sir.

17:55:06 7 Q. And you were giving testimony about
17:55:07 8 what you considered as the witness was accurate
17:55:15 9 and true; weren't you?

17:55:16 10 A. Yes, sir.

17:55:18 11 Q. So when you suggested a number of
17:55:21 12 different countermeasures on pages 1845 to 6,
17:55:30 13 1852, 1853, 1859 and 1860 to 1861 of your
17:55:39 14 testimony, those were measures that you
17:55:41 15 considered were feasible if the FAA had had
17:55:47 16 sufficiently specific intelligence to require
17:55:52 17 them; correct?

17:55:54 18 MR. CAMPBELL: Objection.

17:55:55 19 A. They were measures that I testified
17:55:57 20 we could have imposed. I would have a question
17:56:00 21 as to what feasibility means, but we could have
17:56:03 22 imposed them, yes, sir.

17:56:08 23 MR. PODESTA: Imposed.

17:56:09 24 THE WITNESS: Yes, sir.

17:56:10 25 Q. The FAA could have imposed them on

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
17:56:12 2 the airlines?

17:56:12 3 A. That's correct.

17:56:13 4 Q. Before September 11, 2001?

17:56:15 5 A. Yes, sir.

17:56:17 6 Q. And isn't it true the airlines
17:56:18 7 could have implemented all of those measures
17:56:20 8 themselves before September 11, 2001 --

17:56:23 9 MR. PODESTA: Objection.

17:56:24 10 Q. -- if in the context of the
17:56:26 11 screening process they thought reasonable
17:56:29 12 judgement and caution required it?

17:56:31 13 MR. PODESTA: Objection.

17:56:33 14 MR. CAMPBELL: Objection to the
17:56:34 15 form.

17:56:34 16 MS. VARGAS: Objection to the
17:56:35 17 form.

17:56:35 18 MR. PODESTA: Outside the topic.

17:56:40 19 MS. VARGAS: I am going to allow it
17:56:41 20 purely to the extent you're asking him for
17:56:43 21 interpretation of the good judgment requirements
17:56:47 22 of Appendix II which is authorized. If you want
17:56:49 23 to ask him if the airlines under authority or
17:56:53 24 discretion they had under Appendix II they could
17:56:56 25 have imposed such a countermeasure, you can ask

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
18:02:55 2 A. It will just take a second. It
18:03:12 3 reads "Information indicates a terrorist group
18:03:14 4 or other hostile entity with known capability of
18:03:16 5 attacking civil aviation is likely to carry out
18:03:20 6 attacks against U.S. targets with civil
18:03:21 7 disturbances with direct impact on civil
18:03:22 8 aviation have begun or are imminent." So yes,
18:03:25 9 sir.
18:03:27 10 Q. So the answer to my question is,
18:03:28 11 yes, AVSEC Level III is there is a known
18:03:32 12 terrorist group with known capability that is
18:03:34 13 likely to attack civil aviation in the United
18:03:37 14 States?
18:03:37 15 MS. VARGAS: Objection, he read
18:03:38 16 the precise language of the AVSEC Alert Level
18:03:42 17 III. That is the language.
18:03:44 18 A. Yes, sir.
18:03:47 19 Q. When you answered Mr. Podesta's
18:03:49 20 question, AVSEC Level III was the environment,
18:03:54 21 you meant the environment was there was a known
18:03:57 22 terrorist group capable of attacking and likely
18:04:01 23 to do so. That was the environment pre 9/11,
18:04:05 24 2001; correct?
18:04:07 25 MR. PODESTA: Objection.

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
18:04:07 2 MR. CAMPBELL: Objection to the
18:04:08 3 form.
18:04:08 4 A. Yes, sir.
18:04:09 5 Q. That was the context the airlines
18:04:11 6 had to take into account in exercising good
18:04:14 7 judgment in the whole screening process;
18:04:18 8 correct?
18:04:18 9 A. Yes, sir.
18:04:20 10 MR. WARDEN: Shall we stop for the
18:04:23 11 evening.
18:04:23 12 MS. VARGAS: That would be good.
18:04:28 13 MS. WINTER: I want to remind all
18:04:29 14 counsel they are to pass up all SSI documents
18:04:32 15 that were copies or marked today and none of
18:04:34 16 those SSI documents are to leave this room.
18:04:39 17
18:04:41 18
18:04:44 19 (Continued on following page.)
20
21
22
23
24
25

In The Matter Of:

IN RE SEPTEMBER 11 LITIGATION

ROBERT J. CAMMAROTO

February 12, 2008

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
14:39:48 2 Q. Now, and as you testified
14:39:50 3 yesterday, the FAA actually considered the
14:39:53 4 possibility of changing the four inch knife rule
14:39:56 5 back in 1993; isn't that correct?
14:40:00 6 MR. TOMASIK: Objection.
14:40:01 7 A. That's correct, sir.
14:40:02 8 Q. The FAA decided in 1993 that it
14:40:05 9 should not change the four inch knife rule;
14:40:08 10 isn't that correct?
14:40:08 11 MR. PEPE: Objection.
14:40:09 12 MR. TOMASIK: Objection, asked and
14:40:10 13 answered.
14:40:10 14 A. Yes, sir.
14:40:13 15 Q. And that decision by the FAA not to
14:40:16 16 change the four inch knife rule was based at
14:40:19 17 least in part on the view of persons within the
14:40:21 18 FAA to change -- that changing the rule would
14:40:25 19 not appreciably improve aviation security; isn't
14:40:28 20 that correct?
14:40:29 21 MR. PEPE: Objection, form.
14:40:30 22 MR. TOMASIK: Objection.
14:40:31 23 MS. VARGAS: Objection, asked and
14:40:31 24 answered.
14:40:33 25 A. Yes, sir.

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
14:40:33 2 Q. Is it fair to say, Mr. Cammaroto
14:40:34 3 that prior to 9/11 the FAA did not regard knives
14:40:39 4 with blades under four inches long as a high
14:40:42 5 priority threat item in terms of aviation
14:40:45 6 security?
14:40:46 7 MR. PEPE: Objection.
14:40:46 8 MS. VARGAS: Objection to the
14:40:47 9 form.
14:40:47 10 MR. MIGLIORI: Objection.
14:40:49 11 A. Well I believe that is the language
14:40:51 12 in the, in some of the documents, yes, sir.
14:40:55 13 Q. Now, I would like to direct your
14:40:56 14 attention back to appendices or ask you some
14:41:00 15 questions about Appendices I and II of the
14:41:03 16 ACSSP. Which is Exhibit 2D.
14:41:22 17 A. You said Appendix I and II?
14:41:24 18 Q. I and II, yes.
14:41:25 19 A. I have Appendix I. Yes, sir, go
14:41:30 20 ahead.
14:41:30 21 Q. Now, Appendixes I and II relate to
14:41:38 22 checkpoint screening guidelines; do they not?
14:41:41 23 A. Yes, sir.
14:41:44 24 Q. And Appendix I and II are intended
14:41:47 25 by the FAA for use primarily by individuals

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
15:00:33 2 government's counsel:
15:00:35 3 "Question: Now did FAA have its own
15:00:38 4 intelligence unit that would collect this
15:00:39 5 information from the other agencies?"
15:00:44 6 The transcript records your answer
15:00:45 7 as "Yes, we had a really robust and intelligence
15:00:51 8 group of folks."
15:00:55 9 MS. VARGAS: I think you misread
15:00:56 10 it. Excellent.
15:01:01 11 MR. PODESTA: What did I say?
15:01:02 12 MS. VARGAS: Intelligence.
15:01:03 13 Q. Your answer is even better. "Yes,
15:01:05 14 we had a really robust and excellent group of
15:01:07 15 folks." Do you recall giving that answer?
15:01:09 16 A. I do. I further say that they were
15:01:11 17 both intelligent and excellent, sir.
15:01:13 18 Q. Very good. Thank you.
15:01:14 19 MS. VARGAS: Don't elaborate, Bob.
15:01:17 20 Q. Yes, don't volunteer.
15:01:21 21 Now, you were also asked yesterday
15:01:23 22 about your testimony at the Moussaoui trial with
15:01:27 23 respect to the steps you indicated the FAA could
15:01:29 24 have implemented if it had received certain
15:01:32 25 information about the Al Qaeda plot from Mr.

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
15:01:41 2 Moussaoui pre 9/11, do you recall that?
15:01:43 3 A. Yes, sir, I did.
15:01:47 4 Q. And I'd just like to ask you to
15:01:50 5 take a look at page 1841 of the transcript
15:02:03 6 specifically to the questions asked at page 10
15:02:05 7 through 22 -- lines 10 through 22.
15:02:07 8 A. Excuse me, I am on page 1841, what
15:02:11 9 lines are you asking about?
15:02:12 10 Q. 10 to 22. This time I am only
15:02:15 11 asking about a question. "If I can continue
15:02:17 12 then and ask you what type of countermeasures
15:02:19 13 you could have employed if you received
15:02:21 14 intelligence information that indicated that a
15:02:24 15 person had been arrested at a flight school,
15:02:26 16 taking inappropriate flight training, indicating
15:02:30 17 that they were a member of Al Qaeda, that they
15:02:33 18 were part of a larger plot to fly commercial
15:02:37 19 airliners into buildings in the United States of
15:02:39 20 America, and that that person, as well as
15:02:42 21 others, were going to overcome and take control
15:02:44 22 of the airplane through the use of short blade
15:02:49 23 knives. Could you explain to us what type of
15:02:52 24 countermeasures you could, that were available
15:02:54 25 to you that you could have employed as you did

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
15:02:57 2 in the past with, using perhaps Bojinka as an
15:03:00 3 example to counteract that threat?"
15:03:03 4 Do you recall being asked that
15:03:03 5 question at the Moussaoui trial?
15:03:06 6 MR. MIGLIORI: Objection. For the
15:03:08 7 record I do think this time that you have is
15:03:11 8 allotted for redirect. That is something
15:03:16 9 responsive to a question that was brought up
15:03:18 10 by --
15:03:19 11 MR. PODESTA: Mr. Warden. Who
15:03:20 12 spent a half hour on this topic.
15:03:22 13 MR. MIGLIORI: No, we didn't. In
15:03:24 14 fact we did not get into it, the substance of
15:03:28 15 the Moussaoui. We think this is beyond cross
15:03:33 16 and beyond Touhy.
15:03:34 17 MS. VARGAS: If he would like to
15:03:35 18 authenticate this, I am not going to permit
15:03:38 19 testimony beyond authentication but since Mr.
15:03:40 20 Warden did authenticate testimony right in this
15:03:45 21 very area of testimony, then I will let him
15:03:48 22 authenticate testimony. But we are not going to
15:03:50 23 get into substance beyond that, it is beyond the
15:03:53 24 substance.
15:03:53 25 Q. Do you recall being asked that

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
15:03:55 2 question at the Moussaoui trial?
15:03:56 3 A. Yes, sir, I do.
15:03:57 4 Q. Was it in that context, the context
15:04:00 5 of responding to that question that you
15:04:02 6 described the countermeasures that the FAA could
15:04:04 7 have implemented in response to this
15:04:09 8 information?
15:04:10 9 MS. VARGAS: Objection.
15:04:11 10 MR. MIGLIORI: Objection.
15:04:11 11 MS. VARGAS: Do you have specific
15:04:12 12 testimony you would like him to authenticate, a
15:04:15 13 specific response to that question?
15:04:16 14 MR. PODESTA: Yes. All right.
15:04:17 15 MS. VARGAS: If you would like to
15:04:18 16 go to a particular response, we can go to that.
15:04:22 17 Q. You were asked at page 1845 line 8,
15:04:32 18 "All right, let's talk about what if any
15:04:34 19 countermeasures you could have used before
15:04:36 20 somebody got on a plane. Specifically let's
15:04:38 21 talk about the use of the short blade knives.
15:04:40 22 What is it you could have done in relation to
15:04:43 23 prohibiting the four inch blades?" Do you see
15:04:47 24 that question?
15:04:48 25 A. I do, sir.

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
15:04:49 2 Q. Were you answering that question
15:04:52 3 based on the hypothetical from Mr. Novak that I
15:04:57 4 just read to you from pages 1841 lines 10
15:05:02 5 through 22 of the transcript?
15:05:03 6 MR. MIGLIORI: That is not
15:05:05 7 authenticating.
15:05:06 8 MS. VARGAS: Can you read the
15:05:07 9 whole four pages and ask --
15:05:09 10 MR. PODESTA: Go ahead.
15:05:10 11 MS. VARGAS: If you are limiting
15:05:11 12 the question to whether that answer is response
15:05:13 13 to that line of questioning, he can answer that
15:05:15 14 specific question. But read all four pages.
15:05:18 15 Q. Let me just read into the record
15:05:19 16 while you are doing that. The answer you gave
15:05:21 17 at 1845 lines 13 through 22 was "We could have
15:05:27 18 modified the requirement that the air carriers
15:05:30 19 had at that time in the SSP. There was an
15:05:32 20 Appendix 1 that said what items were prohibited
15:05:35 21 from going on board the aircraft, some general
15:05:38 22 categories, some very specific, but it did have
15:05:40 23 the exception that blades less than four inches
15:05:42 24 were permitted basically. And we could have
15:05:45 25 said in a Security Directive, and that would

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
15:05:47 2 have been the appropriate vehicle, don't allow
15:05:49 3 any blades whatsoever. And that would have, of
15:05:51 4 course had to be applied at the checkpoints."
15:05:54 5 Do you recall giving that testimony
15:05:55 6 at the Moussaoui trial?
15:05:56 7 A. Sorry, sir, I was reading the
15:05:59 8 information. Can I ask you to repeat that, I
15:06:03 9 apologize.
15:06:03 10 MS. VARGAS: He will read it to
15:06:05 11 himself.
15:06:06 12 Q. Read it to yourself and tell me if
15:06:08 13 you gave that answer.
15:06:09 14 MS. VARGAS: Read it to yourself,
15:06:10 15 Bob.
15:06:11 16 A. How far did you want me to go to?
15:06:14 17 MS. VARGAS: 1845.
15:06:15 18 A. 1845.
15:06:16 19 Q. Line 22.
15:06:54 20 A. Okay. I read to the question on
15:06:56 21 line 11 page 1845. "What is it you could have
15:06:59 22 done in relation to prohibiting the four inch
15:07:02 23 blades?"
15:07:02 24 Q. Yes. Did you give the answer that
15:07:05 25 I just read into the transcript?

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1 ROBERT J. CAMMAROTO - CONFIDENTIAL SSI MATERIAL
15:07:08 2 MR. PEPE: Objection.
15:07:09 3 MR. MIGLIORI: Objection.
15:07:09 4 A. Line 13 through line 22?
15:07:11 5 Q. Yes.
15:07:12 6 A. I will take a look, I stopped
15:07:13 7 reading it at that question.
15:07:27 8 Yes, sir, I did give that answer in
15:07:29 9 the context of what we could have done provided
15:07:32 10 information that allegedly Mr. Moussaoui had
15:07:35 11 withheld.
15:07:38 12 Q. As the type of information that Mr.
15:07:41 13 Novak described in the transcript at page 1841,
15:07:45 14 lines 10 through 22; is that correct?
15:07:49 15 MS. HESSION: Objection.
15:07:56 16 A. It was in response to that line of
15:07:58 17 questioning, yes, sir.
15:08:00 18 Q. Fine. Thank you. As a practical
15:08:03 19 matter, Mr. Cammaroto, do screeners have only a
15:08:06 20 limited amount of time to screen each passenger
15:08:11 21 passing through the security checkpoint?
15:08:14 22 MS. HESSION: Objection.
15:08:15 23 MR. PEPE: Objection to the form,
15:08:16 24 scope.
15:08:17 25 MS. VARGAS: Objection to the